

Exhibit 8

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ROBERT L. JANECA, Individually, and as)	
Administrator of the Estate of John R. Janega,)	No. 2021L006219
Deceased, and Pamela Janega,)	
)	
Plaintiffs,)	
)	
vs.)	
)	
ELECTROLUX HOME PRODUCTS, INC., a)	
foreign corporation, et al.)	
)	
Defendants.)	
)	
)	
UNITED SERVICES AUTOMOBILE ASSOC.)	
as subrogee of MARK L. STEHLING,)	
)	
Intervening Plaintiff,)	
)	
vs.)	
)	
ELECTROLUX HOME PRODUCTS, INC.,)	
)	
Defendant.)	

PLAINTIFFS' SECOND SET OF INTERROGATORIES
ADDRESSED TO TRANSFORM HOLDCO LLC

Pursuant to Illinois Supreme Court Rules, you are hereby requested to respond to the following Interrogatories within twenty-eight (28) days of the date of service hereof and supplemented thereafter in accordance with the Illinois Supreme Court Rules.

Definitions and Instructions

A. Definitions

1. **Document** – When used in these requests, the term “document” shall be construed in its broadest sense so as to include recorded information in any form, and shall include without limitation, both an original and any non-identical copy, writing, any printed or graphic representation, catalogue, circular, advertisement, brochure, label, manual, report, letter, drawing, sketch, note, and memorandum. The term “document” shall also include any information stored in, maintained on, or accessible through computers, disk drives, or other limitation program files, data files and data compilations from which information can be obtained (translated, if necessary,

by you, into a reasonably useable form), together with the codes or programming instructions and other materials necessary to understand and to use such systems.

2. **Transform Holdco LLC, You, and Your** – When used in these requests, the terms “Transform Holdco,” “You,” and “Your” shall mean Transform Holdco LLC, its predecessors and successors in interest, its present and former officers, directors and employees, its parent, subsidiaries, divisions, entities, and affiliated companies, and its attorneys, representatives, agents and all other persons acting or authorized to act on its behalf, including third-party entities.

3. **Sears** – When used in these requests, the term “Sears” shall mean Sears, Roebuck and Co., Sears Holdings Management Corporation, and/or Sears Holdings Corporation.

B. Instructions

1. Your answers to these interrogatories shall be served within the time frame provided by the Illinois Supreme Court Rules.

2. If you refuse to respond to any of these interrogatories, or to produce any document, on the basis of a claim of privilege or exemption from discovery, please furnish the following information for each such document:

- a. date(s) the document was generated,
- b. identity of the author(s) of the document,
- c. description of the document (e.g., letter, deed, memorandum, etc.),
- d. identity of any indicated recipient(s) of the document,
- e. identity of every person to whom the document has ever been disclosed, and the date(s) and circumstances of each such disclosure,
- f. subject matter of the document,
- g. basis for claiming privilege or exemption from discovery, and
- h. all facts upon which you rely to support your claim or privilege or exemption from discovery.

3. In the event you object to any interrogatory in whole or in part, state in complete detail in your answer the nature of your objection, and comply with any part of the interrogatory to which you do not object.

4. These interrogatories require you to provide information within your possession, custody, or control, and within the possession, custody, or control of anyone over whom you have control, including without limitation, any officer, agent, servant, employee, attorney, insurance company, investigator, or independent adjusting company.

5. These interrogatories are continuing in character so as to require you to promptly supplement your answers if you obtain further or different information or documents after serving your answers, in accordance with the Illinois Supreme Court Rules.

INTERROGATORIES

1. List all natural persons possessing an ownership interest in You or any other entity or entities that possess an ownership interest in You, either directly or through other entities, and include the percentage of ownership for each such person.

ANSWER:

2. Of the persons listed in Your answer to Interrogatory 1, identify all of whom have ever possessed any ownership interest in Sears.

ANSWER:

3. List all natural persons having an executive, officer, management, or director level position for You and include the name of such position for each person.

ANSWER:

4. Of the persons listed in Your answer to Interrogatory 3, identify all of whom have ever possessed an executive, officer, management, or director level position in Sears and include the name of such position for each person.

ANSWER:

5. List all retail stores that You or an affiliate company own, manage, or operate under the Sears' brand that were purchased or otherwise acquired from Sears.

ANSWER:

Respectfully submitted,

BY: Mark V. Ferrante

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Dated: December 27, 2022

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

ROBERT L. JANECA, Individually, and as)	
Administrator of the Estate of John R. Janega,)	No. 2021L006219
Deceased, and Pamela Janega,)	
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Plaintiffs,)	
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vs.)	
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ELECTROLUX HOME PRODUCTS, INC., a)	
foreign corporation, et al.)	
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Defendants.)	
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UNITED SERVICES AUTOMOBILE ASSOC.)	
as subrogee of MARK L. STEHLING,)	
)	
Intervening Plaintiff,)	
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vs.)	
)	
ELECTROLUX HOME PRODUCTS, INC.,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Plaintiffs' Second Set of Interrogatories Addressed to the Transform Holdco LLC was duly served on December 27, 2022, upon the following via e-mail as follows:

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s/ Patrick A. Hughes
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